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February 6, 2023

VIA ELECTRONIC MAIL

Andrew Schapiro
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Re: *Calhoun v. Google LLC*, No. 4:20-cv-05146-YGR-SVK (N.D. Cal.)
Mapping Tables Preservation Issue: Follow-up List of Questions Further to the
January 31, 2023 Joint Status Report

**THIS LETTER CONTAINS DISCOVERY MATERIAL
DESIGNATED “CONFIDENTIAL” OR “HIGHLY CONFIDENTIAL”
BY DEFENDANT GOOGLE LLC**

Dear Counsel:

Further to the Parties’ meet-and-confer Zoom call on January 27, 2023, and consistent with our update to the Court in the *Joint Status Report Pursuant to Brown Dkt. No. 830 and Calhoun Dkt. No. 930* filed January 31, 2023, the *Calhoun* Plaintiffs submit the following list of additional questions to assist in our evaluation of Google’s assertion that the at-issue [REDACTED] and [REDACTED] mapping tables are entirely duplicative of (or could be “derived from”) other tables:

1. How will Google be able to re-construct the links between the Biscotti-to-Biscotti identifiers contained in [REDACTED] if [REDACTED] is deleted?
2. For Google Account holders, we understand that Google represented that it is preserving the Biscotti encryption and decryption keys that enable full Gaia-Biscotti linking as they exist in [REDACTED] logs and data sources. Is this correct?
3. Is it Google’s position that these Gaia-to-Biscotti linkages are sufficient to identify Google Account holder data across Gaia and Biscotti-keyed sources?
4. To illustrate, is it correct that [REDACTED] maps Biscotti1 to Biscotti2?

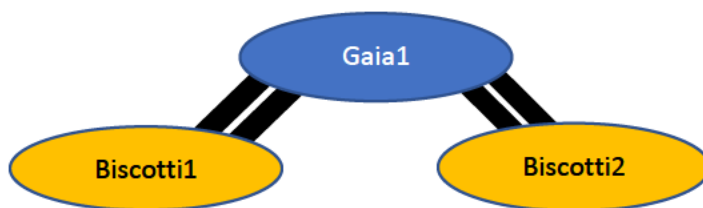


5. However, Google is maintaining mappings via Biscotti encryption/decryption keys such that Gaia1=Biscotti1 and Gaia1=Biscotti2?

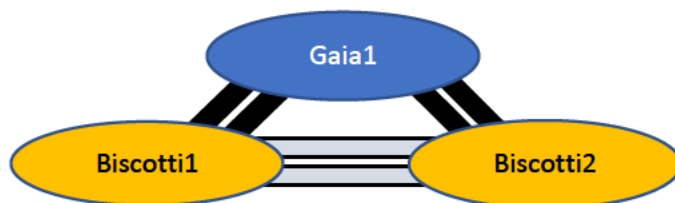
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6. However, it is not necessary to maintain the Biscotti1 to Biscotti2 so long as Google maintains the Gaia1 mappings? The reason for this is that Google can re-create the Biscotti1 to Biscotti2 mapping – rendering separate maintenance of Biscotti1 to Biscotti2 unnecessary? Please confirm.



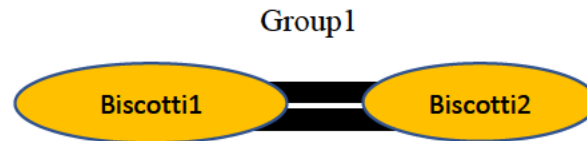
7. For Google Account holders, are the Gaia-Biscotti linkages that make the Biscotti-Biscotti linkages in [REDACTED] unnecessary as comprehensive as the Biscotti-Biscotti linkages in [REDACTED]? If yes, please state as much. If no, please explain the ways in which they are not as comprehensive.
8. For non-Google Account holders, can device identifiers be the intermediate identifiers that can create the transitive association between Biscotti1 to Biscotti2?
9. What other intermediate identifiers can create the transitive association between Biscotti1 to Biscotti2? And where are those intermediate identifier mappings stored and for how long?
10. How long are the [REDACTED] mappings preserved, both today and during the proposed Class Period?
11. Do the at-issue [REDACTED] and Analytics mapping tables contain mappings in addition to Biscotti-to-Biscotti?
- Is Zwieback present in [REDACTED]?
 - Is Gaia present in [REDACTED]?
 - Are URLs (full or shortened) present in [REDACTED]?
 - Are there any Sync status signals in the tables?

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12. Are any of these tables being preserved for any other litigation or regulatory review? If so, which ones?
13. What specifically is uniquely contained in the [REDACTED] mapping tables (but not in other preserved data sources) that would not be preserved if the tables are not preserved?
14. Is Google preserving the derivation programs and encryption/decryption keys for:
- a. [REDACTED];
 - b. [REDACTED]; and
 - c. Other data sources identified in Google's letter?
15. How is the Group ID assigned by [REDACTED] to link different Biscottis determined?
16. Is the Group ID (say Group1) assigned by [REDACTED] to link the Biscotti IDs persistent? If not, please explain what causes the changes?



17. What is the lifetime of a linkage in [REDACTED]?
18. What, if anything, can cause a linkage in [REDACTED] to be removed?
19. Assuming the linkage (Group1) between the two Biscottis (Biscotti1 and Biscotti2) was removed, if later these two Biscottis are linked together by [REDACTED], are they assigned the same Group ID of Group1?

Sincerely,

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Lesley Weaver

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A handwritten signature in dark ink, appearing to read "David Straite". The signature is fluid and cursive, with a prominent "D" and "S".

David Straite

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cc: Viola Trebicka, Esq.
Steve Broome, Esq.
An Truong, Esq.
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Sharon Cruz, Esq.
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